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BEFORE THE POSTAL REGULATORY COMMISSEPTED 1/16/2013 WASHINGTON, D.C. 20268-0001

Periodic Reporting	Docket No. RM2012-6

PITNEY BOWES INC. MOTION FOR LEAVE TO FILE REPLY TO COMMENTS OF THE GREETING CARD ASSOCIATION (January 16, 2013)

Pursuant to 39 C.F.R. § 3001.21, Pitney Bowes Inc. (Pitney Bowes) respectfully requests leave to file this Reply to the January 7, 2013 comments of the Greeting Card Association (GCA). Although the Commission's rules do not authorize a reply as a matter of right, 39 C.F.R. § 3001.21(b) allows the Commission to accept such a pleading as a matter of discretion.

The GCA raises several novel legal and policy objections to Pitney Bowes' proposal to adopt a blended AADC / 3-Digit benchmark for purposes of measuring workshare-related costs avoided within First-Class Mail Automation Letters. This Reply addresses those objections. No party will be prejudiced by the granting of this Motion.

For the foregoing reasons, Pitney Bowes respectfully requests that the Commission accept its Reply to the GCA's comments.

Respectfully submitted,

/s/____

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